

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

SERVICIOS FUNERARIOS GG, S.A. DE C.V.,

Case No. 23-cv-10684

Plaintiff/Counter-Defendant,

v.

ADVENT INTERNATIONAL CORPORATION,

Defendant/Counter-Plaintiff.

**DECLARATION OF CARLOS M. SIRES IN SUPPORT OF SERVICIOS FUNERARIOS
GG, S.A. DE C.V.'s RULE 11 MOTION FOR SANCTIONS
AGAINST ADVENT INTERNATIONAL CORPORATION AND ITS COUNSEL**

I, Carlos M. Sires, a Partner of the law firm of Boies Schiller Flexner LLP, counsel for Plaintiff and Counterclaim-Defendant Servicios Funerarios GG, S.A. DE C.V. ("SF") in this matter, respectfully submit this Declaration in Support of SF's Rule 11 Motion for Sanctions against Advent International Corporation ("AIC") and its Counsel and state as follows:

1. Exhibit A annexed hereto is a translation of the introductory pages (pages GSO-1705249 through '253) of SF's civil complaint filed against AIC and others in Mexico, filed under seal. Because the complaint is hundreds of pages long, SF is not filing it in its entirety in support of the motion. However, SF will do so upon the Court's direction.

2. Exhibit B annexed hereto is SF's Answer to Interrogatory 8.

3. Exhibit C annexed hereto are SF's Interrogatories 10 and 11 and AIC's Amended Responses thereto, filed under seal.

4. Exhibit D annexed hereto is a machine translation of the preface, chapter 13, chapter 14, the author's "Note for Reflection," the Saucedo Citation, and publication information from *Traición en Palacio* by Hernán Gómez Bruera, published June 2023.

5. Exhibit E annexed hereto contains relevant excerpts from the July 10, 2019 Adversary Proceeding Complaint in the *Oro Negro* litigation. Because the complaint is over a hundred pages long, SF is not filing it in its entirety in support of the motion. However, SF will do so upon the Court's direction.

6. Exhibit F annexed hereto is a machine translation of Alejandro Saucedo's *Código Activista* blog post, dated December 29, 2021, available at <https://codigoactivista.com/gobierno/guillermo-barradas-abogado-de-la-corrupcion/>

7. Exhibit G annexed hereto is a machine translation of Maribel Velazquez and Mariana Salinas's *e-consulta* article, dated February 8, 2022, available at <https://www.e-consulta.com/nota/2022-02-08/politica/por-extorsion-indaga-fgr-bufete-vinculado-toma-de-udlap>

The foregoing is true and correct to the best of my knowledge.

Dated: March 22, 2024

Respectfully submitted,

LESSER, NEWMAN, ALEO & NASSER LLP

BOIES SCHILLER FLEXNER LLP

Michael Aleo
Thomas Lesser
39 Main Street, Suite 1
Northampton, MA 01060
Telephone: (413) 584-7331
Facsimile: (413) 586-7076
aleo@LLN-law.com
lesser@LLN.law.com

*Counsel for Plaintiff / Counter-Defendant,
Servicios Funerarios GG, S.A. de C.V.*

/s/ Carlos M. Sires
David Boies*
Brooke A. Alexander*
333 Main Street
Armonk, NY 10504
Telephone: (914) 749-8200
Facsimile: (914) 749-8300
dboies@bsflfp.com
mayala@bsflfp.com

Carlos M. Sires*
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
Facsimile: (954) 356-0022

csires@bsflp.com
jhilborn@bsflp.com

*Counsel for Plaintiff / Counter-Defendant,
Servicios Funerarios GG, S.A. de C.V.*

*Indicates attorney admitted *pro hac vice*

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served on all counsel of record via electronic mail on the date below pursuant to Rule 5 and Rule 11(c)(2).

Date: March 22, 2024

By: /s/ Carlos M. Sires
Carlos M. Sires

CERTIFICATE OF SERVICE

I, Carlos M. Sires, hereby certify that the above was filed through the ECF system and that I have caused a true and correct copy of the above to be served on Plaintiff's counsel.

Date: April 22, 2024

By: /s/ Carlos M. Sires
Carlos M. Sires